

**SF-83 SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Pulp and Paper Production
(40 CFR Part 63, Subpart S)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Pulp and Paper Production (40 CFR part 63, subpart S) (Renewal)

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Pulp and Paper Production were proposed on December 17, 1993, and promulgated on April 15, 1998. These regulations apply to facilities that produce pulp, paper, or paperboard by employing kraft, soda, sulfite, semi-chemical, or mechanical pulping processes using wood; or any process using secondary or non-wood fiber and that emits 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants. Affected sources are all the hazardous air pollutant (HAP) emission points or the HAP emission points in the pulping and bleaching system for mechanical pulping processes using wood and any process using secondary or non-wood fiber. This information is being collected to assure compliance with 40 CFR part 63, subpart S.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance and are required of all sources subject to NESHAP standards.

Any owner or operator subject to the provisions of this part shall maintain a file of these documents, and retain the file for at least five years following the date of such notifications, reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Approximately 137 sources are subject to the standard, and it is estimated that no new sources will become subject to the standard in the next three years. It is further assumed that there is one affected facility per plant. These assumptions are based on the research conducted by EPA during the subpart S rule making, and consultation with the industry. EPA is also aware that this industry is undergoing widespread consolidation and corporate restructuring, and that no new facilities are being built, though approximately 15 percent of the affected facilities will rebuild one or more process units in a given year.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any “Terms of Clearance.”

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as Amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

- (A) Establish and maintain such records; (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and
- (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAPs from pulp and paper plants, which include acetaldehyde; benzene; carbon disulfide; chloroform; formaldehyde; methanol; methyl ethyl ketone; toluene; and xylene emissions, cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for this source category were promulgated at 40 CFR part 63, subpart S.

2(b) Practical Utility/Users of the Data

The control of emissions of HAP from pulp and paper plants requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAP from pulp and paper plants are the result of operation of the affected facilities. These standards rely on the collection of HAP emissions in enclosed and closed vent collection. The collected HAPs are then either incinerated in a boiler or lime kiln or treated in a wastewater treatment system. HAPs captured from bleaching systems are controlled with a chlorine gas scrubber. Equipment inspection, performance tests, and leak detection and repair procedures are critical components of the standards. The required notifications are used to inform the Agency or delegated authority when a source becomes subject to the standard. The reviewing

authority may then inspect the source to check if the pollution control system is properly installed and operated and that leaks are being detected and repaired and that the standard is being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standard, and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate their control equipment and achieve continuous compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

The recordkeeping and reporting requested is required under 40 CFR part 63, subpart S.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

Some of the facilities subject to this NESHAP will also be subject to requirements under the New Source Performance Standard (NSPS) for Kraft Pulp Mills, 40 CFR 60 subpart BB. The burden requested for this NESHAP does not duplicate any of the burden accounted for under NSPS subpart BB.

3(b) Public Notice Required Prior to ICR Submission to Office of Management and Budget (OMB)

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register on May 25, 2004, (69 FR 29718). No comments were received on the burden published in the Federal Register.

3(c) Consultations

EPA consulted Timothy Hunt of the American Forest and Paper Association (202-463-2588) to obtain information on the industry and associated burden for this ICR. EPA also

consulted its Air Facility System (AFS) to identify sources subject to the standard.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the required standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR 1320.5.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

Respondents are owners or operators of sources associated with the production of wood pulp, including but not limited to kraft, soda, sulfite, semi-chemical, mechanical, non-wood pulping, secondary fiber, or any combination of these types of pulping processes. Affected processes at the wood pulping sources include pulping, bleaching, and wastewater handling.

Standard	SIC Codes	NAICS Codes
40 CFR Part 63, Subpart S	2611 Pulp mills	32211
	2621 Paper mills	32212
	2631 Paperboard mills	32213

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by 40 CFR part 63, subpart S.

A source must make the following reports:

Notification Reports	
Requirement	Regulation reference
Construction/reconstruction	63.5
Construction or modification application	63.455(d)
Initial notifications	63.9(b)(2)
Anticipated startup	63.9(b)
Actual startup	63.9(b)(4)(v)
Initial performance test results	63.10(d)(2)
Initial performance test	63.7(b), 63.9(e)
Rescheduled initial performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)
Compliance status	63.9(h)
Physical or operational change	63.5(b)(4)
Opacity or visible emissions	n/a
Periodic startup, shutdown, malfunction reports	63.10(d)(5)(I)

Notification Reports	
Source status report	63.10(e)(3)
Semiannual Control Strategy Update (thru 2006)	63.455(b)

A source must maintain the following records:

Recordkeeping	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	63.10(b)(2)
Emission test results and other data needed to determine emissions	63.454(a)
All reports and notifications	63.10(b)
Record of applicability	63.10(b)(3)
Records for sources with continuous monitoring systems	63.10(3)
Records are required to be retained for five years. Records must be kept onsite for the first two years, for the remaining three years records can be kept in a readily accessible off-site location.	63.454
Site Specific Inspection Plans	63.454(b)

Electronic Reporting

Currently, sources are using monitoring equipment that provides automated parameter data in an automated way, e.g., inlet and outlet concentrations when determining percent efficiency. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. Modern pulp and paper facilities employ distributive controls on their manufacturing process and have integrated many of the compliance record keeping and reporting requirements into their systems. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. It is estimated that approximately 10 percent of the respondents use

electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
<p>Install, calibrate, certify, maintain, and operate Continuous Monitoring Systems (CMS) for each of the following affected units:</p> <p>1.1 Non-Sulfite Pulping Process choice of:</p> <ul style="list-style-type: none"> a. provide documentation that vent streams are introduced to the flame zone of a boiler, lime kiln, or recovery furnace, or b. provide documentation that the control incinerator is operating at a minimum level of 1600 F and 0.75 second residence time, or c. Performance test of control device using Method 308. <p>1.2. Sulfite Pulping Process - performance test of control device using test method 308.</p> <p>2.1. Bleaching Process Vent Scrubber (MACT I Mills) choice of:</p> <ul style="list-style-type: none"> a. provide documentation of scrubber operating parameters or previous performance test results, or b. performance test of scrubber or control device using test Method 26A. <p>2.2 Bleaching Process Vent Scrubber (MACT III Mills) choice of:</p> <ul style="list-style-type: none"> a. provide documentation of scrubber operating parameters, or previous performance test results, or b. performance test of scrubber or control device using test Method 26A. <p>3.1 Non-Sulfite Pulping Wastewater Treatment</p> <ul style="list-style-type: none"> a. performance test of condensate segregation and control device using test method 305 or b. performance test of biotreatment unit using test Method 304. <p>3.2 Sulfite Pulping Process</p> <ul style="list-style-type: none"> a. performance test of control device using test Method 305.
Perform the following initial performance test using appropriate Reference test Methods 26A, 304, 305, 308, and repeat performance tests if necessary.
Conduct initial and annual inspections of enclosures, closed vent and wastewater conveyance systems using test Method 21.
Write the notifications and reports for: initial notification; compliance status; initial compliance strategy report; compliance strategy report update; semiannual summary report; continuous monitoring/exceedance reports; notifications of performance tests, construction/reconstruction, and actual startup.
Enter information required to be recorded for continuous monitoring for operating parameters, periodic inspections (monthly visual and annual Method 21) startups, shutdowns and malfunctions, personnel training and time for audits.

Respondent Activities
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

5. The Information Collected -- Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions, such as, control device fire box temperature, gas and liquid flow rates, production volume, wood species, under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for

problem identification, as a check on source operation and maintenance, and for compliance determinations.

The records required by this regulation must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

Approximately 20 percent of the industry are considered small business entities, defined as being independently owned and operated and not dominant in their field of operations. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

The recordkeeping and reporting requirements were selected within the context of this specific subpart and the specific process equipment and pollutant(s). The impact on small businesses was accounted for in the regulation development. The requirements reflect the burden on small businesses. Even though, the recordkeeping and reporting requirements are the same for small and larger businesses. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced. The Agency considers these requirements the minimum needed to ensure compliance and cannot reduce them further for small businesses.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost, NESHAP for Pulp and Paper Production (40 CFR part 63, subpart S).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. To minimize burden, much of the information the EPA would need to determine compliance would be recorded and retained onsite at the facility. Such information would be reviewed by enforcement personnel during an inspection and would not need to be routinely reported to the EPA. In addition, in many cases the EPA has selected parameters for monitoring that are already monitored by the industry for other purposes. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 42,444 hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the standards or test methods, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$95.32	(\$45.39 + 110%)
Technical	\$64.60	(\$30.76 + 110%)
Clerical	\$40.09	(\$19.09 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December, 2003, "Table 10. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital and Operations and Maintenance Costs

Since no continuous emission monitors are used to comply with this rule, the only type of industry costs associated with the information collection activity in the standards are labor costs and emission testing costs described below.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

Since this rule does not require any continuous emission monitoring or electronic data submittal, total capital costs are expected to be insignificant. Continuous monitoring requirements are for parametric monitoring and these systems are already in place; therefore, no new equipment would be required by the recordkeeping and reporting requirements. It is assumed that all mills will contract a testing company to provide sampling and analytical services for air and water tests.

Based on EPA's experience the testing methods required for this rule, the purchase of service for each method is estimated as follows:

- Method 308 - \$14,000;
- Method 26A - \$10,000;
- Method 304 - \$11,000;
- Method 305 - \$16,000; and
- Method 21 - \$3,000.

These estimates include labor, materials, and analytical costs. The number of mills assumed to contract testing companies for compliance is presented in Table 1. For the entire industry, the number of tests required annually for demonstrating compliance and the associated cost are estimated as follows:

• Method 308 - 1 Tests x	\$14,000 =	\$14,000
• Method 26A - 0 Tests x	\$10,000 =	\$0
• Method 304 - 2 Tests x	\$11,000 =	\$22,000
• Method 305 - 5 Tests x	\$16,000 =	\$80,000
• Method 21- 87 Tests x	\$3,000 =	<u>\$261,000</u>
	TOTAL	\$377,000

Based on these estimates for testing costs and the number of mills assumed to perform compliance tests, the total annual cost to the industry is \$377,000.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$48,813 see Table 2 in Section 6(e).

This cost is based on the average hourly labor rate as follows:

Managerial	\$54.66	(GS-13, Step 5, \$34.16 x 1.6)
Technical	\$40.56	(GS-12, Step 1, \$25.35 x 1.6)
Clerical	\$21.95	(GS-6, Step 3, \$13.72 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2004 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Annual Agency Burden and Cost. The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records and reports maintained by the respondents, periodic evaluation of sources of emissions, and the analysis, publication and distribution of collected

information. The only Federal costs are user costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, there are approximately 137 existing sources currently subject to the standard. It is estimated that no additional sources will become subject to the regulation in the next three years.

Number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Respondents that Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	137	0	0	137
2	0	137	0	0	137
3	0	137	0	0	137
Average	0	137	0	0	137

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 137. This number appears on the OMB 83-I form in block 13(a), Number of respondents.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$

Total Annual Responses				
Semiannual report	137	2	0	274
Exceedance report	21	2	0	42
Compliance strategy report update	27	1	0	27
Notification of performance test	24	1	0	24
Notification of construction/reconstruction	21	1	0	21
Notification of actual startup	21	1	0	21
			Total	409

The number of Total Annual Responses is 409. This number is shown on the OMB 83-I form in block 13(b), Total annual responses.

The Total Hours Requested is shown on the OMB 83-I form in block 13(c). The total annual labor costs are \$2,708,125. The annual labor costs are not shown on the OMB 83-I form. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NESHP for Pulp and Paper Production (40 CFR part 63, subpart S) attached.

The total annual capital/startup and O&M costs to the regulated entities are \$377,000. This number is shown on the OMB 83-I form in block 14(c), Total annualized cost requested. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 1,240 labor hours at a cost of \$49,158. See Table 2. Annual Agency Burden and Cost, NESHP for Pulp and Paper Production (40 CFR part 63, subpart S) attached.

6(e) Bottom Line Burden Hours And Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The Total Hours Requested is shown on the OMB 83-I form in block 13(c). The total annual labor costs are \$2,708,125. The annual labor costs are not shown on the OMB 83-I form. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NESHP for Pulp and Paper Production (40 CFR part 63, subpart S) attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to

average 104 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$377,000. This number is shown on the OMB 83-I form in block 14(c), Total annualized cost requested. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 1,240 labor hours at a cost of \$49,158. See Table 2. Annual Agency Burden and Cost, NESHP for Pulp and Paper Production (40 CFR Part 63, Subpart S) attached.

6(f) Reasons for Change in Burden

The decrease in burden from the most recently approved ICR is due to a reduction in annual burden due to an improved estimate of the number of facilities.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 104 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number OECA-2004-0019, which is available for public viewing at the Enforcement and Compliance Docket and Information Center Docket in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Avenue, N.W., Washington, D.C. The EPA Docket

Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number OECA-2004-0019 and OMB Control Number 2060-0387 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.